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Subject: Small Remote Incinerator (SRI) Coalition responses to EPA comments and suggestions regarding the testing protocol to be executed in 2014

Dear Toni:

On February 14, 2014, we received by email from you EPA's second round of comments on the testing protocol we plan to implement beginning next month. Thank you for sending those. We reviewed them and offer the responses below. To respond, we copied your comments into this letter and put our replies immediately beneath them. Please let us know as soon as possible whether EPA concurs with or objects to any of the responses below.

EPA Comment 1: According to our Audit Program website (available at <http://epa.gov/ttn/emc/email.html#audit>), audit materials exist for HCl; Cd, Pb, and Hg; dioxins / furans; SO₂; and NO_x using the methods specified. Please include use of these audit materials in the testing program.

SRI Coalition Response 1: Since we are using instrumental methods for NO_x and SO₂, audit materials are inapplicable. For the other pollutants, we will use audit materials that are available at the time of testing. Thus far, we have been instructed by EPA (Candace Sorrell) that audits are available for only HCl, Cd, Pb, and Hg. They are not available for dioxins and furans.

EPA Comment 2: According to our Electronic Reporting Tool website (available at <http://www.epa.gov/ttn/chief/ert/index.html>), all of the methods specified are available for electronic reporting. Use of the ERT should be required for these methods in the testing program. Instructions for ERT installation and use are included at the website.

SRI Coalition Response 2: We will use the ERT to the extent it allows. Because of the complexity and volume of data we will be collecting, we can foresee the need to make repeated reference to hard copy submittals.

EPA Comment 3: Since the Phase II of testing is no longer expected, please explain how variability across the category will be demonstrated (just one test from one unit in each category would provide just one value per batch). Since our UPL calculation requires at least 3 values, there should be results from at least 3 tests from each category to appropriately determine if any variability exists across the category. This concern has been raised previously, so please ensure that the revisions to the testing protocol clarify that individual run values should be included, though we also want aggregate averages that represent batch combustion where appropriate (some are semi-continuous feed small-batch, so testing across a number of batch cycles makes sense there).

SRI Coalition Response 3: All individual run values will be included in the reports. The SRI types being tested in this program are the following:

1. Oil and Gas: using natural gas as auxiliary fuel and incinerating sludge (1);
2. Oil and Gas: using natural gas as auxiliary fuel and not incinerating sludge (6);
3. Oil and Gas: using diesel as auxiliary fuel and incinerating sludge (1);

EPA Comment 4: Page 7, Table 2 – Why are there two lines for Method 29 with different minimum run durations?

SRI Coalition Response 4: One line is for the two-hour runs conducted to understand emissions variability. The other line is for the four-hour runs being conducted to help ensure we collect enough sample to be above method detection limits.

EPA Comment 5: We note there is no analysis (comparable to that specified in Table 9) for ash. We recommend starting with clean units, collecting ash samples at the end of testing, and having them analyzed.

SRI Coalition Response 5: Our primary focus in this testing effort is to characterize emissions and understand emission variability among SRI units. We can see that ash sampling may be valuable as a tool to help individual operators to refine and make more efficient their facility-specific operations. As such, we propose to leave it up to each individual incinerator operator as to whether or not to perform these analyses.

EPA Comment 6: Page 6, Section 1.1 - We suggest requiring testing to begin with the first waste charge rather than when the auxiliary fuel warm-up period begins. Please pay particular attention to how much of the burn down time is included in the testing period. For units with an extended burn down, the burn down could encompass an entire test run or more if the whole burn down time is included in the test period. Emissions from a test run that did not include any waste charging would likely be significantly lower.

SRI Coalition Response 6: This is a good comment but it does raise a fundamental question: do the regulations apply only during waste combustion? Even at start-up? We are flexible on this point but seek to better understand with EPA how the regulations apply in these cases before finalizing our plans. In any case, to move forward, we will collect test data during the startup and burn-down periods but ensure it is clearly denoted in the records generated.

EPA Comment 7: Page 8 – Has consideration been given to how ambitious these simultaneous testing approaches can be against the physical realities of access to the stack at these incinerators? At Pogo Mine, for instance, a man lift was necessary to access the stack. Switching ports was very difficult and simultaneous testing would be a serious challenge.

SRI Coalition Response 7: Yes and we are planning around these access and logistical issues.

EPA Comment 8: General Comment – One of the major difficulties encountered at Pogo Mine was the extremely high stack gas temperatures. Testers used a one-piece quartz nozzle to withstand the high temperatures, but then experienced repeated nozzle breakage issues when the nozzle was removed from the hot stack into the cold ambient air (40 degrees). Consider adding language to include mitigative measures, such as gradual removal of glass sampling probes from the stack to allow slower cooling and hopefully minimize breakage.

SRI Coalition Response 8: We will discuss this with our testers to ensure we mitigate against the possibility of probe breakage. Thank you for sharing this experience.

EPA Comment 9: Combustion temperature and pressure measurement device calibration could also be assessed readily by use of a redundant sensor.

SRI Coalition Response 9: We appreciate this helpful comment. Not every incinerator to be tested is equipped currently with both temperature and pressure measurement devices. As such, as part of the pre-test work, plans are being developed for each facility to ensure accurate temperature and pressure measurements.

EPA Comment 10: We recommend revising the narrative of the document to address the apparent “looseness” of the protocol. More specifically, use of “should” and “may,” as well as “recommend” leave ambiguity in the protocol. Consider revising the document to state what is required; absent that, we recommend including language that spells out the consequences of not following recommended practices (i.e., “If the data are not collected in this manner, they will not be used.”)

SRI Coalition Response 10: Our objective is to ensure comparable data is collected among the different incinerators. To this end, we are coordinating all the tests through an individual quality control entity whose primary goals are to minimize differences in testing approaches and to ensure data comparability. We must leave some flexibility in

the protocol to allow for the inevitable site variations and limitations that exist and will be encountered. We will document in the test reports substantial protocol deviations.

We look forward to launching this testing program next month and to meeting with you in late June or early July to discuss initial test results. Again, please let us know if you have any concerns with our responses and don't hesitate to contact either of us if you have any questions.

Sincerely,



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